

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

PACTIV Corporation  
Attn: Kent Boyd  
2607 North 25th Avenue  
Franklin Park, Illinois 60131

Application No.: 87010034

I.D. No.: 031096ALI

Applicant's Designation:

Date Received: August 30, 2004

Subject: Thermoforming Process

Date Issued: December 14, 2004

Expiration Date: July 26, 2006

Location: 2607 North 25th Avenue, Franklin Park

Permit is hereby granted to the above designated Permittee to OPERATE emission sources (s) and/or air pollution control equipment consisting of eight storage silos controlled by dust collector, seven dryers (three gas-fired), five crystallizers (three gas-fired), eight extruders, nineteen thermoformers, two cold cleaning degreasers, and twenty-seven natural-gas combustion units pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s).

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for VOM, 10 tons/year for any single HAP and 25 tons/year of combined HAPs), as further described in Attachment A. As a result, the source is excluded from requirements to obtain a Clean Air Act Permit Program permit.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) issued for this location.
2. The permit is issued based on plastic extrusion and thermoforming operations not being subject to the requirements of 218.986 pursuant to 35 Ill. Adm. Code 218.980. This is a consequence of the voluntary limits placed on operations and emissions contained in this and previous federally enforceable permits.
- 3a. Emissions and operation of the extruders, thermoformers, and degreasers shall not exceed the following limits:

<u>Material</u>	<u>VOM Content</u>	<u>Material Usage</u>		<u>VOM Emissions</u>	
		<u>(Per Month)</u>	<u>(Per Year)</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
Polystyrene and Polypropylene	0.035 wt.%	6,000 Tons	60,000 Tons	4,200	21.0
Degreaser Solvent	6.72 lb/gal	25 gals	250 gals	168	0.84
Mold Release Agent	0.289 lb/gal	200 gals	2,000 gals	578	2.89
			Totals	4,946	24.73

b. HAP Emissions:

<u>Material</u>	<u>Styrene Content</u>	<u>Material Usage (Tons/Mo)</u>	<u>Usage (Tons/Yr)</u>	<u>Styrene Emissions (Lb/Mo)</u>	<u>Emissions (Tons/Yr)</u>
Polystyrene	0.03 wt%	3,300	33,000	1,980	9.9

c. These limits are based on the maximum usage rate, maximum VOM content, and material balance. Compliance with all annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

d. This permit is issued based on the degreasing solvent containing less than 5 percent by weight of halogenated HAP solvents listed in 40 CFR 63.460(a). As a result, this permit is issued based on the source not being subject to 40 CFR 63 Subpart T, NESHAP for Halogenated Solvent Cleaning.

4a. Emissions and operation of all fuel combustion emission units shall not exceed the following limits:

<u>Material</u>	<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>Pollutant</u>	<u>Emission Factor (Lb/mmcsf)</u>	<u>Emissions (Ton/Mo)</u>	<u>(Ton/Yr)</u>
Natural Gas	15	75	NO <sub>x</sub>	100	0.75	3.8
			CO	84	0.63	3.2
			PM <sub>10</sub>	7.6	0.1	0.3
			VOM	5.5	0.1	0.2

These limits are based on maximum fuel usage and standard emission factors (AP-42). Compliance with annual limits shall be determined from a running total of 12 months of data.

b. Natural gas shall be the only fuel used in all the fuel combustion sources. Use of any other fuel other than natural gas requires a permit revision.

5. Emissions of particulate matter from the storage silos, material handling, dryers and crystallizers shall not exceed 0.02 gr/scf, 2.18 lb/hour and 9.55 tons/year. This limit is based on emissions controlled by a pulse-jet dust collector at 12,500 cfm (12,476 scfm).

6. This permit is issued based on negligible emissions of particulate matter from seven dryers and five crystallizers. For this purpose, emissions from each group of equipment shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

7. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

- 8a. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
- b. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
9. Pursuant to 35 Ill Adm. Code 218.182(c), the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure which exceeds 1.0 mmHg (0.019 psi) measured at 20°C (68°F).
10. The Permittee shall comply with the following operating requirements for cold cleaning degreasers, pursuant to 35 Ill. Adm. Code 218.182:
  - a. Waste solvent shall be stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
  - b. The cover of the degreaser shall be closed when parts are not being handled and parts are drained until dripping ceases.
  - c. The degreaser must be equipped with a cover which is closed whenever parts are not being handled in the cleaner.
  - d. The degreaser shall be equipped with a device for draining cleaned parts until dripping ceases.
  - e. A permanent conspicuous label summarizing the operating procedure must be affixed to the degreaser; and
  - f. If a solvent spray is used, the degreaser must be equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.
11. The Permittee shall maintain monthly records of the following for cold cleaning degreasers, pursuant to 35 Ill. Adm. Code 218.182:
  - a. The name and address of the solvent supplier;
  - b. The date of purchase;
  - c. The type of solvent; and
  - d. The vapor pressure of the solvent measured in mmHg at 20°C (68°F).
12. The Permittee shall maintain records of the following items:

- a. Polystyrene and polypropylene usage (ton/month and ton/year);
  - b. Mold release agent usage (gal/month and gal/year);
  - c. Degreaser solvent usage (gal/month and gal/year);
  - d. VOM and HAP content of polystyrene, polypropylene, mold release agent and degreaser solvent (lb/gal or weight %);
  - e. Total natural gas usage (mmscf/mo and mmscf/yr);
  - f. VOM emissions (lb/month and ton/year); and
  - g. HAP emissions (lb/month and ton/year).
13. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
  14. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
  15. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

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It should be noted that the permit has been revised to include the operation of additional equipment, as indicated in Construction Permit 04080071.

If you have any questions on this permit, please call John Blazis at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emission from the thermoforming plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below levels, (i.e., 25 tons per year of VOM, 10 tons/year of any single HAP and 25 tons/year of a combination of all HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit or Process Group</u>	<u>VOM</u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>PM</u>	<u>Single HAP</u>	<u>Combined HAP</u>
Polystyrene and Polypropylene	21.0				9.9	21.0
Degreaser Solvent	0.84				0.84	0.84
Mold Release	2.89					
Fuel Combustion	0.20	3.8	3.2	0.3		
Storage and Handling, Dryers and Crystalizers				9.55		
Totals:	24.93	3.8	3.2	9.85	----	21.84

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